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GRAPH FOUNDATION, INC.
6

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION
10

11 NEO4J, INC., a Delaware corporation

12 Plaintiff,

13 vs.

14 GRAPH FOUNDATION, INC., an Ohio
15 corporation,

16 Defendant.
17

Case No. 5:19-CV-06226-EJD

**STIPULATION EXTENDING TIME FOR
PLAINTIFF TO MOVE TO STRIKE AND
[PROPOSED] ORDER**

Plaintiff Neo4J, Inc. (“Plaintiff”), by and through its attorneys of record, and Defendant Graph Foundation, Inc. (“Defendant”), by and through its attorney, John D. Pernick, Esq., (Plaintiff and Defendant, collectively, the “Parties”), HEREBY STIPULATE AS FOLLOWS:

WHEREAS, Defendant filed its Answer to the Complaint on December 26, 2019.

WHEREAS, Under Rule 12(f)(2) of the Federal Rules of Civil Procedure, the deadline for Plaintiff to file a Motion to Strike with respect to the Answer is January 16, 2020.

WHEREAS, the Parties are meeting and conferring with respect to Plaintiff’s claim that certain of the affirmative defenses alleged in the Answer are insufficient.

WHEREAS, in order to give the Parties sufficient time to meet and confer on these issues to determine whether an agreement can be reached, the Parties have agreed that the deadline for Plaintiff to file any Motion to Strike with respect to the Answer should be extended by 14 days.

IT IS HEREBY STIPULATED THAT:

1. The deadline for Plaintiff to file any Motion to Strike with respect to Defendant’s Answer shall be January 30, 2020.

Dated: January 8, 2020

BERGESON, LLP

By: /s/ John D. Pernick
John D. Pernick
Attorneys for Defendant
GRAPH FOUNDATION, INC.

Dated: January 8, 2020

HOPKINS & CARLEY

By: /s/ Jeffrey M. Ratinoff
John V. Picone III
Jeffrey M. Ratinoff
Attorneys for Plaintiff
NEO4J, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

United States District Judge

ATTESTATION

I, John D. Pernick, am the ECF User whose identification and password are being used to file this **STIPULATION EXTENDING TIME FOR PLAINTIFF TO MOVE TO STRIKE AND [PROPOSED] ORDER**. In compliance with Civil Local Rule 5-1(i)(3), I attest that all other signatories have concurred in this filing.

Dated: January 8, 2020

By: /s/ John D. Pernick
John D. Pernick